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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

JENNIFER JOY FREYD,

Plaintiff,

v.

UNIVERSITY OF OREGON,
MICHAEL H. SCHILL, and HAL
SADOFSKY,

Defendants.

No. 6:17-cv-448-MC

**DEFENDANT MICHAEL H. SCHILL'S
MOTION FOR SUMMARY JUDGMENT**

(ORAL ARGUMENT REQUESTED)

I. CERTIFICATE OF COMPLIANCE WITH L.R. 7-1

Counsel for Defendant Michael Schill ("Schill") certifies that, pursuant to Local Rule 7-1, they have conferred in good faith with plaintiff's counsel regarding this motion, and the parties have been unable to resolve the disputed subject matter of the motion.

II. MOTION AND ARGUMENT

Schill moves for summary judgment on all remaining claims against him. In support of this motion, Schill wholly adopts and incorporates by reference, as if set forth herein, Defendants

1 - DEFENDANT MICHAEL H. SCHILL'S MOTION
FOR SUMMARY JUDGMENT

University of Oregon and Hal Sadofsky's Motion for Summary Judgment (the "University's Motion"). Schill does not, however, adopt or incorporate the argument from pages 43-45 of the University's Motion, preceding the Conclusion section. Additionally, Schill also wholly adopts and incorporates the Declarations of Paula A. Barran, Andrea Larson, Hal Sadofsky, Nicholas B. Allen, David Conover, Brandalee Davis, Gordon C. Nagayama Hall, and Phillip A. Fisher, in Support of the University's Motion, as well as all Exhibits attached thereto.

DATED: November 16, 2018

PERKINS COIE LLP

By: s/ Nathan R. Morales

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2 - DEFENDANT MICHAEL H. SCHILL'S MOTION
FOR SUMMARY JUDGMENT

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